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DOCKET FILE COPY ORIGINAL

February 13, 1998

**EX PARTE PRESENTATION**

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**RECEIVED**

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

FEB 13 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Salas:

Please be advised that today the attached letter was hand delivered to Ms. Jeannie Su, Attorney-Adviser, Policy and Program Planning Division, Common Carrier Bureau, in connection with the above-referenced proceeding. The letter provides certain requested information and documents concerning SBC's compliance with the "competitive checklist" items related to interconnection and access to poles, ducts, and conduits.

Should you have any questions concerning the foregoing, do not hesitate to contact me. In accordance with the Commission's rules, an original and two copies of this notification are submitted herewith.

Very truly yours,

Attachment

cc: Ms. Su (w/o attachment)

No. of Copies rec'd  
List ABOVE

0+2



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February 13, 1998

Ms. Jeannie Su  
Attorney-Adviser  
Policy and Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Re: *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Oklahoma, CC Docket No. 97-121*

Dear Ms. Su:

Pursuant to the staff's recent request, I am providing information and documents concerning SBC's compliance with the "competitive checklist" items relating to interconnection and access to poles, ducts, and conduits. Specifically, I am attaching (1) several diagrams that depict the various interconnection trunking arrangements available to competitive local exchange carriers; (2) Southwestern Bell Telephone Company's Interconnector's Technical Publication for Physical Collocation (Issue 7, October 15, 1997); and (3) Pacific Bell's generic Pole and Conduit License Agreement.

Should you have any questions concerning the foregoing, do not hesitate to contact me.

Very truly yours,

A handwritten signature in black ink, reading "Todd F. Silbergeld".

Attachments

(1)

# APPENDIX ITR -SCENARIO 1

## SINGLE RATE AREA - COMBINED SWBT LOCAL/ACCESS TANDEM WITHOUT DIRECT END OFFICE TRUNKING

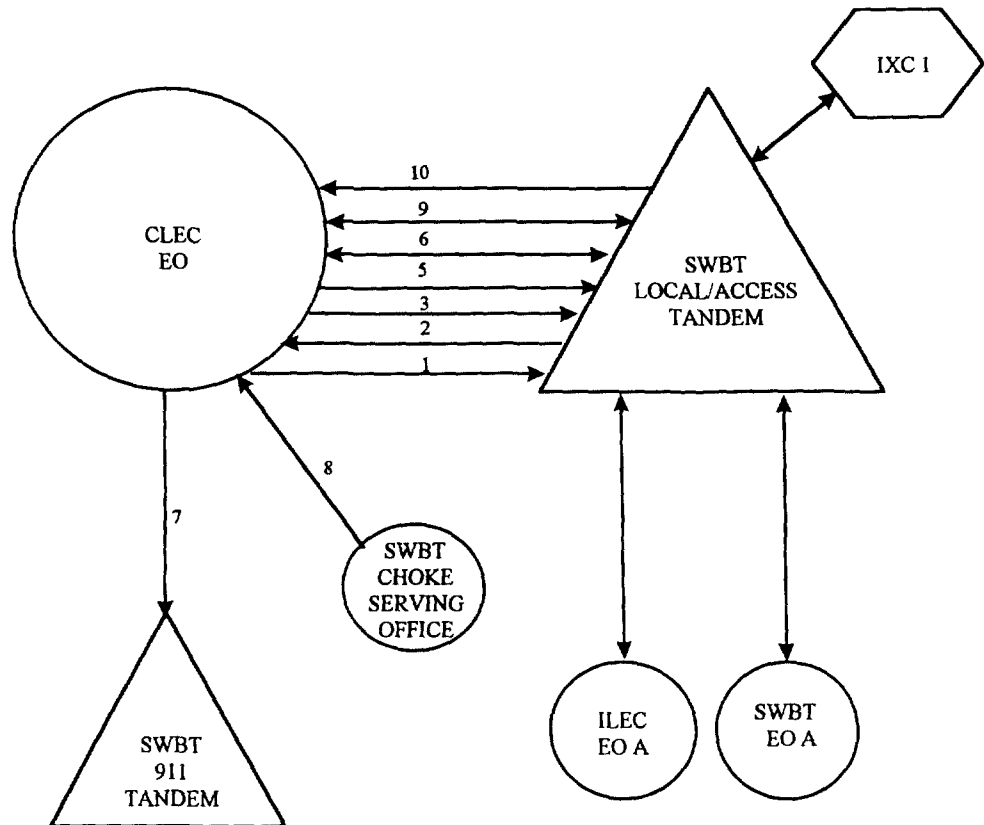


CHART #	TRAFFIC USE	CODE	MODIFIER	DESCRIPTION
1	DD	J		INTRALATA AND LOCAL (MF OR SS7 SIGNALING)
2	TC	J		INTRALATA AND LOCAL (MF OR SS7 SIGNALING)
3	TO	CRJ		MASS CALLING CHOKNG TRUNK GROUP (MF SIGNALING ONLY)
4				(DD800 deleted this version)
5	MD	J		INTERLATA ONLY (MF SIGNALING) (NOTE 2)
6	MD	J		INTERLATA ONLY (MF OR SS7 SIGNALING)
7	ES	J		EMERGENCY SERVICE (MF SIGNALING)
8	IE	CRJ		TRUNKS TO DELIVER CHOKED TRAFFIC (MF OR SS7) (NOTE 3)
9	DT	J		INTRALATA AND LOCAL 2-WAY (MF OR SS7 SIGNALING)(NOTE 4)
10	TC	CRJ		TRUNKS TO DELIVER CHOKED TRAFFIC (MF OR SS7) (NOTE 5)

NOTE 1: (Deleted this version)

NOTE 2: Required at the Dallas 4 ESS switch only for 10xxx number cut through and Feature Group B over D

NOTE 3: Required when CLEC EO serves a Mass Call/Public Response subscriber to receive choked calls.

NOTE 4: Required in lieu of #1 and #2 for two-way trunking

NOTE 5: Required when CLEC establishes new choke NXX

**APPENDIX ITR -SCENARIO 2**  
**SINGLE RATE AREA - COMBINED SWBT LOCAL/ACCESS TANDEM**  
**WITH DIRECT END OFFICE TRUNKING**

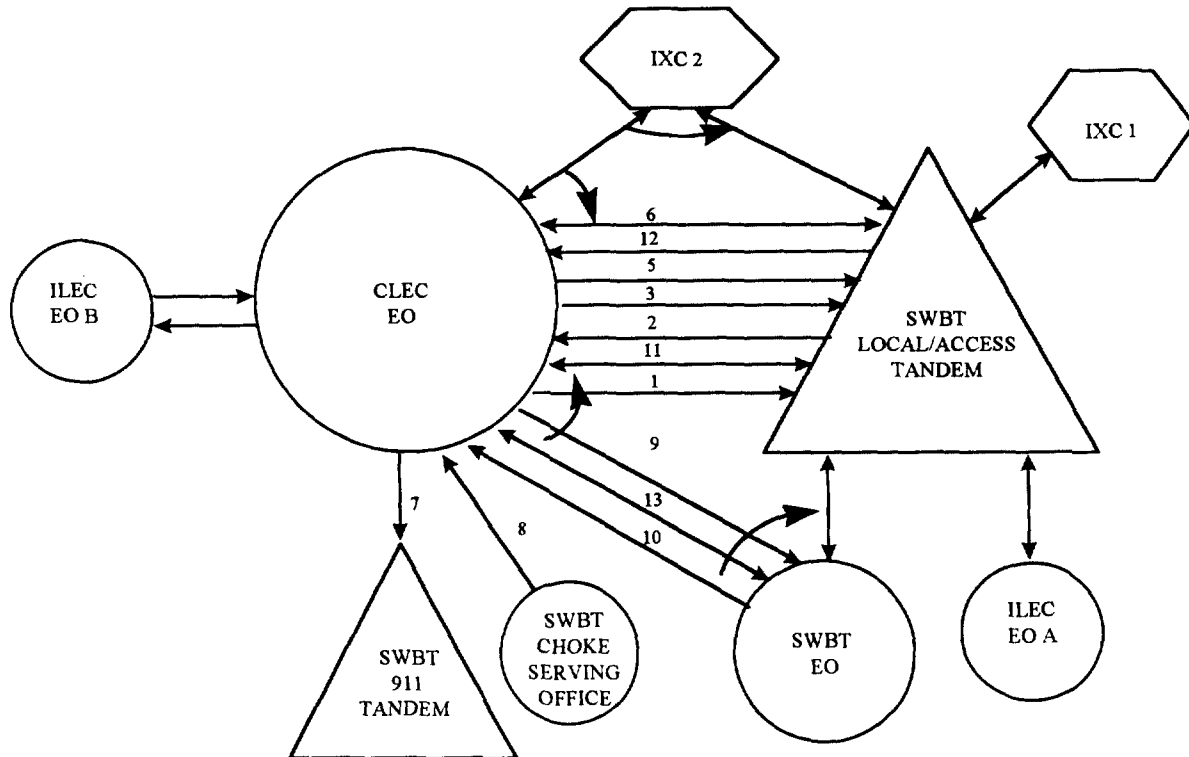


CHART #	TRAFFIC USE CODE	MODIFIER	DESCRIPTION
1	DD	J	INTRALATA AND LOCAL (MF OR SS7 SIGNALING)
2	TC	J	INTRALATA AND LOCAL (MF OR SS7 SIGNALING)
3	TO	CRJ	MASS CALLING CHOKNG TRUNK GROUP (MF SIGNALING ONLY)
4			(DD800J deleted this version)
5	MD	J	INTERLATA ONLY (MF SIGNALING) (NOTE 2)
6	MD	J	INTERLATA ONLY (MF OR SS7 SIGNALING)
7	ES	J	EMERGENCY SERVICE (MF SIGNALING)
8	IE	CRJ	TRUNKS TO DELIVER CHOKED TRAFFIC (MF OR SS7) (NOTE 3)
9 & 10	IE	J	TERMINATING IN END OFFICE ONLY (MF OR SS7 SIGNALING) (NOTE 4)
11	DT	J	INTRALATA AND LOCAL 2-WAY (MF OR SS7 SIGNALING) (NOTE 5)
12	TC	CRJ	TRUNKS TO DELIVER CHOKED TRAFFIC (MF OR SS7) (NOTE 6)
13	TE	J	TERMINATING IN END OFFICE ONLY (MF OR SS7) (NOTE 4) (NOTE 7)

NOTE 1: (Deleted this version)

NOTE 2: Required at the Dallas 4 ESS switch only for 10xxx number cut through and Feature Group B over D

NOTE 3: Required when CLEC EO serves a Mass Call/Public Response subscriber to receive choked calls.

NOTE 4: May terminate IntraLATA Toll calls provided inter-company compensation agreements executed.

NOTE 5: Required in lieu of #1 and #2, for two-way trunking.

NOTE 6: Required when CLEC establishes new choke NXX

NOTE 7: Required in lieu of #9 and #10, for two-way trunking.

**APPENDIX ITR -SCENARIO 3**  
**SINGLE RATE AREA - SEPARATE SWBT LOCAL AND ACCESS TANDEM**  
**WITHOUT DIRECT END OFFICE TRUNKING**

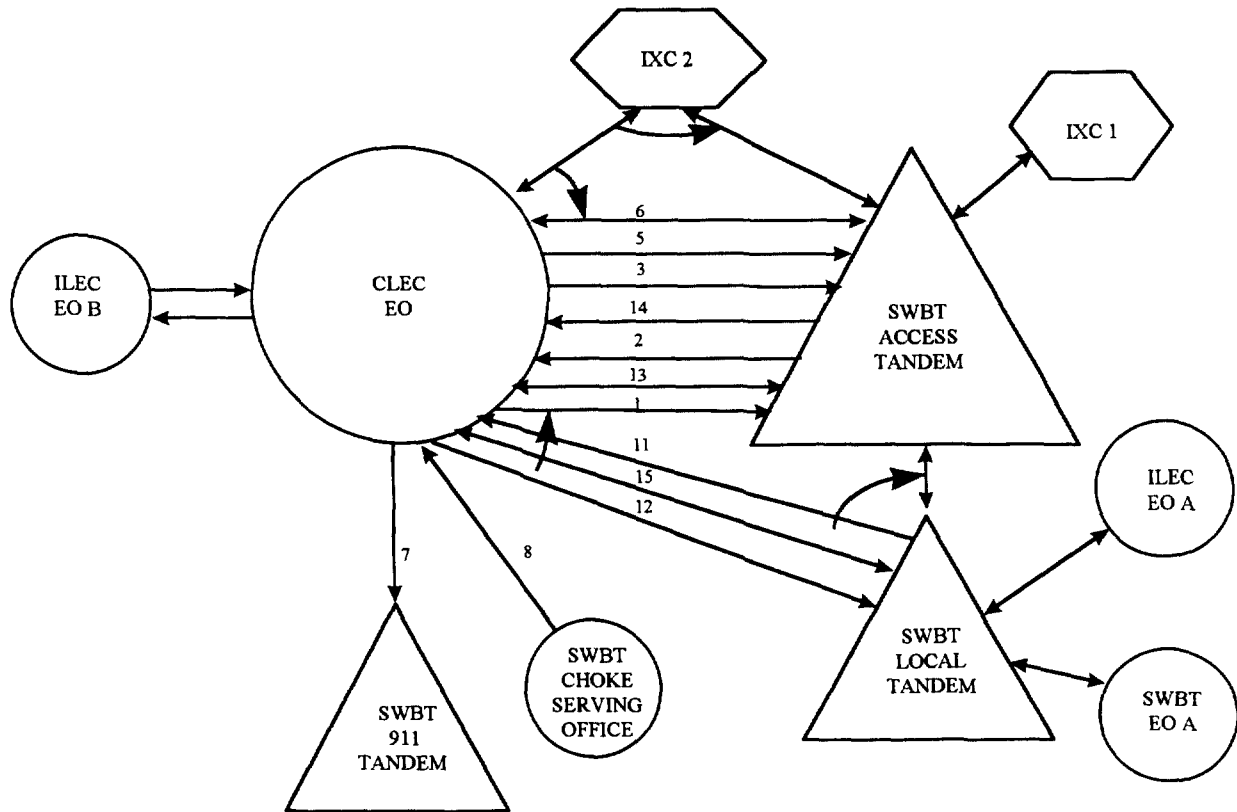


CHART #	TRAFFIC USE CODE	MODIFIER	DESCRIPTION
1	DD	J	INTRALATA AND LOCAL (MF OR SS7 SIGNALING)
2	TC	J	INTRALATA AND LOCAL (MF OR SS7 SIGNALING)
3	TO	CRJ	MASS CALLING CHOKING TRUNK GROUP (MF SIGNALING ONLY)
4			(DD800J deleted this version)
5	MD	J	INTERLATA ONLY (MF SIGNALING) (NOTE 2)
6	MD	J	INTERLATA ONLY (MF OR SS7 SIGNALING)
7	ES	J	EMERGENCY SERVICE (MF SIGNALING)
8	IE	CRJ	CHOKED TRUNKS (MF OR SS7 SIGNALING) (NOTE3)
11	TG	J	TERMINATING IN END OFFICE ONLY(MF OR SS7 SIGNALING)(NOTE 4)
12	TO	J	TERMINATING IN END OFFICE ONLY(MF OR SS7 SIGNALING)(NOTE 4)
13	DT	J	INTRALATA AND LOCAL TWO-WAY (MF OR SS7 SIGNALING)(NOTE 5)
14	TC	CRJ	TRUNKING TO DELIVER CHOKED TRAFFIC (MF OR SS7)(NOTE 6)
15	OG	J	TERMINATING IN END OFFICE ONLY TWO-WAY(MF OR SS7)(NOTE4&7)

NOTE 1: (Deleted this version)

NOTE 2: Required at the Dallas 4 ESS switch only for 10xxx number cut through and Feature Group B over D

NOTE 3: Required when CLEC EO serves a Mass Call/Public Response subscriber to receive choked calls.

NOTE 4: May terminate IntraLATA Toll calls provided inter-company compensation agreements executed.

NOTE 5: Required in lieu of #1 and #2 for two-way trunking.

NOTE 6: Required when CLEC establishes new choke NXX

NOTE 7: Required in lieu of #11 and #12 for two way trunking

**APPENDIX ITR - SCENARIO 4**  
**SINGLE RATE AREA - SEPARATE SWBT LOCAL AND ACCESS TANDEM**  
**WITH DIRECT END OFFICE TRUNKING**

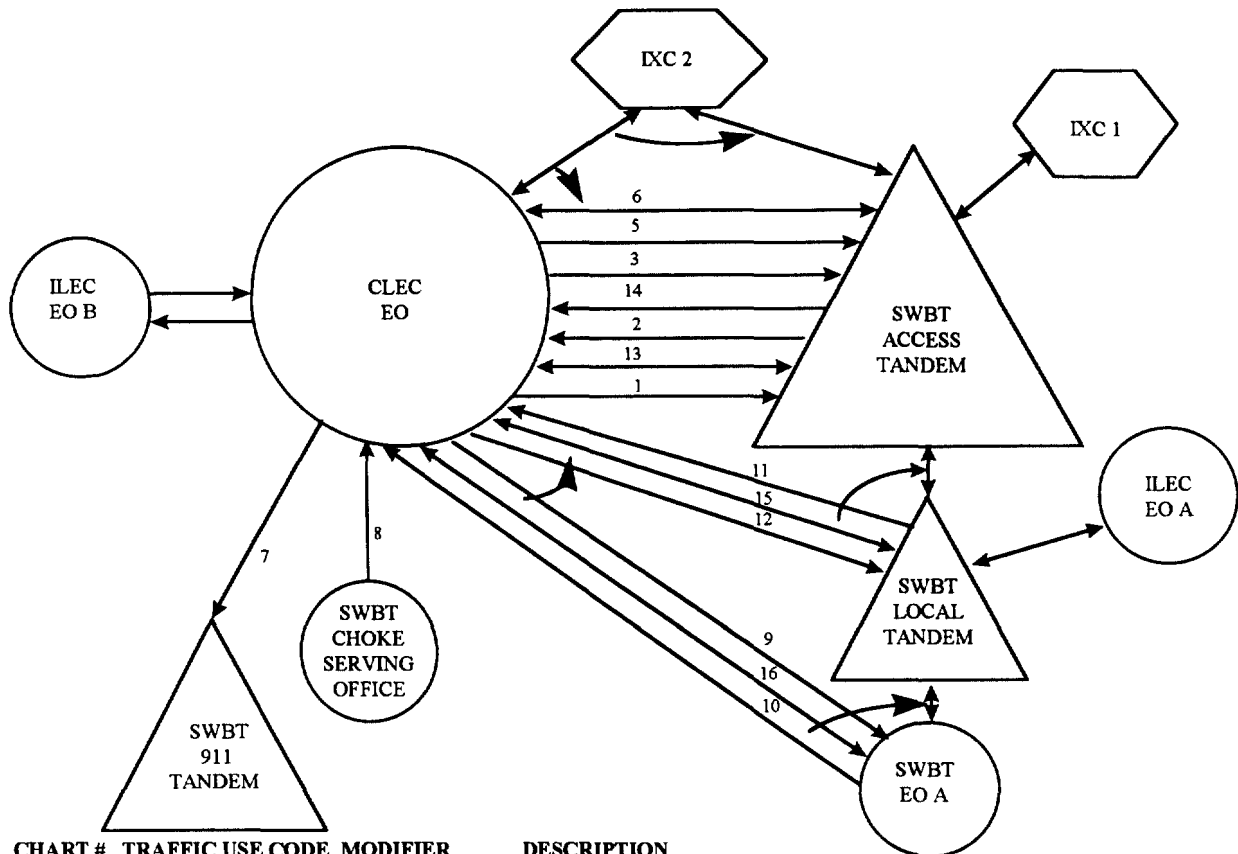


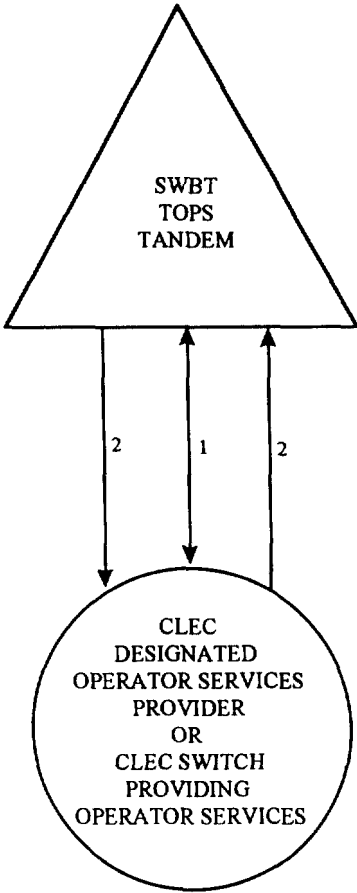
CHART #	TRAFFIC USE CODE	MODIFIER	DESCRIPTION
1	DD	J	INTRALATA ONLY (MF OR SS7 SIGNALING)
2	TC	J	INTRALATA ONLY (MF OR SS7 SIGNALING)
3	TO	CRJ	MASS CALLING CHOKNG TRUNK GROUP (MF SIGNALING ONLY)
4			(DD800J deleted this version)
5	MD	J	INTERLATA ONLY (MF SIGNALING) (NOTE 2)
6	MD	J	INTERLATA ONLY (MF OR SS7 SIGNALING)
7	ES	J	EMERGENCY SERVICE (MF SIGNALING)
8	IE	CRJ	CHOKED TRUNKS (MF OR SS7 SIGNALING) (NOTE3)
9 & 10	IE	J	TERMINATING IN END OFFICE ONLY(MF OR SS7)(NOTE 4)
11	TG	J	TERMINATING IN END OFFICE ONLY(MF OR SS7 SIGNALING)(NOTE 4)
12	TO	J	TERMINATING IN END OFFICE ONLY(MF OR SS7 SIGNALING)(NOTE 4)
13	DT	J	INTRALATA AND LOCAL TWO-WAY (MF OR SS7 SIGNALING)(NOTE 5)
14	TC	CRJ	TRUNKING TO DELIVER CHOKED TRAFFIC (MF OR SS7)(NOTE 6)
15	OG	J	TERMINATING IN END OFFICE ONLY TWO-WAY (MF OR SS7) (NOTE4&7)
16	IE	J	TERMINATING IN END OFFICE ONLY TWO-WAY (MF OR SS7) (NOTE4&8)

- NOTE 1: (Deleted this version)  
 NOTE 2: Required at the Dallas 4 ESS switch only for 10xxx number cut through and Feature Group B over D  
 NOTE 3: Required when CLEC EO serves a Mass Call/Public Response subscriber to receive choked calls.  
 NOTE 4: May terminate IntraLATA Toll calls provided inter-company compensation agreements executed.  
 NOTE 5: Required in lieu of #1 and #2 for two-way trunking.  
 NOTE 6: Required when CLEC establishes new choke NXX.  
 NOTE 7: Required in lieu of #11 and #12 for two way trunking  
 NOTE 8: Required in lieu of #9 and #10 for two way trunking

**APPENDIX ITR -SCENARIO 5**

**SINGLE RATE AREA - SWBT IS NOT THE OPERATOR SERVICES PROVIDER**

**121 INWARD OPERATOR ASSISTANCE**



<u>CHART #</u>	<u>TRAFFIC USE CODE</u>	<u>MODIFIER</u>	<u>DESCRIPTION</u>
1	OA	J	ACCESS TO INWARD OPERATOR (121) (MF SIGNALING)(NOTE 1)
2	OA	J	ACCESS TO INWARD OPERATOR (121) (MF SIGNALING)(NOTE 2)

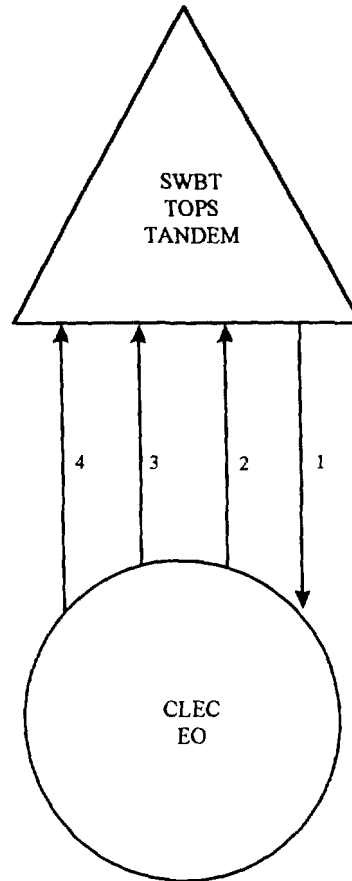
NOTE 1: Two-Way trunking is preferred interconnection arrangement

NOTE 2: One Way trunking may provided at the request of the CLEC in lieu of two way trunking



## APPENDIX ITR -SCENARIO 6

### SINGLE RATE AREA - SWBT PROVIDES OPERATOR SERVICES FOR CLEC



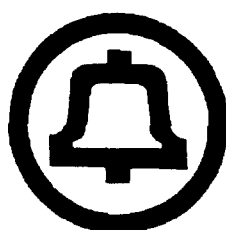
<u>CHART #</u>	<u>TRAFFIC USE CODE</u>	<u>MODIFIER</u>	<u>DESCRIPTION</u>
1	VR	J	BUSYLINE VERIFICATION (MF, OPERATOR SVCS SIGNALING)
2	DACC	J	DIRECTORY ASSISTANCE /DIR. ASSISTANCE CALL COMPLETION (MF SIGNALING, OPERATOR SERVICES SIGNALING)
3	ETCM2	J	0-, 0+, COMBINED COIN & NONCOIN (MF SIGNALING, OPERATOR SERVICES SIGNALING)
4	ETCMF	J	0-, 0+, DA, DACC COMBINED COIN AND NONCOIN (MF SIGNALING, OPERATOR SERVICES SIGNALING)



(2)

FEB 13 1998

# Southwestern Bell Telephone Company



*Interconnector's  
Technical Publication*

*for*

*Physical Collocation*

*Issue 7  
October 15, 1997*

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## Changes included in Issue 7 - July , 1997

<u>SECTION</u>	<u>CHANGE</u>
All	Pages renumbered to make future releases easier to distribute and to reduce turn around time. Each major section now has page numbers.
1	Removed specific reference to fiber.
1.3	Deleted as unnecessary and renumber 1.4
2.1	Added reference to CEVs, Huts, and Cabinets where required by law.
2.3	Changed 60 day reference to what is required by the applicable tariff or agreement.
2.4	Removed example because it did not add clarity.
3.A.1.1	Reworded for clarity and added fiber where required by law.
3.A.1.3	Clarified that TP76300 can be obtained from the Manager - Information Release and Services. (Also added at the end of the Appendix, a list of sources for all documentation mentioned in this publication)
3.A.3.4	Correct typo at end of sentence to say "where <u>available</u> ."
3.A.3.6	Corrected typo from last release that was not updated to correctly reference section 3.A.3.19 instead of 3.A.3.16.
3.A.3.7	Clarified that POT frame can accommodate a maximum of approximately 1,000 VG pairs.
3.A.3.7	Changed "may" to "should" to indicate that designs larger that 1,000 VG pairs should use the VF POT Frame design.
3.A.3.7	Changed "VF Distributing Frame" to "VF POT Distributing Frame" to clarify that the VF frame is a POT Frame.
3.A.3.7	Added that POT Frame may be placed in the Common Collocation area where required by law.
3.A.3.15 - 26	Renumbered to correct numbering error from previous release.
3.A.3.20	Clarified that SWBT will not maintain any records where there is a direct interconnection between two physically collocated interconnectors.
3.A.3.21	Added wording which is also in paragraph 3.A.3.6 to emphasize that equipment placed in the POT frame for interconnection must be identical to that listed.

- 3.A.3.20 Clarified wording to indicate that when SWBT is selected as the installation and furnish vendor, it will only install a complete POT and/or VG frame.
- 3.A.3.20 Capitalized LUCENT to emphasize that SWBT will require this exact type of DS1 or DS3 interface in the POT frame.
- 3.A.3.20 Added section, that will be updated in next release, referring to POT Bay design when POT location is in the Collocation Common area.
- 3.A.3.20 Added reference to LUCENT bidirectional FDF shelf and modules.
- 3.A.3.20 Replaced reference to LUCENT DIXI-3 panels with LUCENT DDF panels.
- 3.A.3.21 Engineering Design charges for Initial and Non-Standard increased to match Texas Tariff Charges.  
Initial EDC increased from \$4,220 to \$4,250 (\$30 increase)  
Non-Standard EDC increased from \$1,320 to \$1,330 (\$10 increase)
- 3.A.3.22 Added sentence that clarified the work activities covered by the EDC.
- Section 3 Entire section was renumbered to conform to numbering in the rest of the document.
- 3.B.1.3 Added need for one (1) year forecast and stated that it will be used to determine power consumption rates.
- 3.B.2.2 Reworded for clarity.
- 3.B.3.1 Reworded for clarity.
- 3.B.4.A Reworded for clarity.
- 3.B.4.B Reworded for clarity.
- 3.B.5 Reworded for clarity.
- 3.B.6.1 Reworded for clarity.
- 3.B.6.3 Reworded for clarity.
- 3.B.6.5 Reworded for clarity.
- 3.B.6.5.D Reworded for clarity.
- 4.A.1.7 Engineering Design charges for Initial and Non-Standard increased to match Texas Tariff Charges.  
Initial EDC increased from \$4,220 to \$4,250 (\$30 increase)  
Non-Standard EDC increased from \$1,320 to \$1,330 (\$10 increase)
- 4.A.3 Deleted ordering information on DS1s and DS3s because they are not part of the

## Physical Collocation offering.

- 4.A.3 (New) Added reference to LSR for interconnectors ordering local service interconnection.
- 4.B.1.3 Reworded for clarity.
- 4.B.2.8 Added wording to indicate that interconnector should contact SWBT prior to ordering any equipment to be placed in its' collocation area if there is any question as to whether it is compatible with SWBT requirements.
- 4.B.2.10 Added "where required by law" to first sentence.
- 4.B.2.11 Added additional responsibilities of the collocator. This information was added from the proposed Texas Collocation Tariff filed in June, 1997.
- 5.A.1 Added reference to LOC for trouble reporting.
- 6.A.1.8 Deleted paragraph.
- 6.A.1.8 (New) Clarified wording about requiring direct access from the exterior.
- 6.A.2.1.A Changed 60 day reference to what is required by the applicable tariff or agreement.
- 6.A.2.1.H Deleted reference to fiber to indicate that other alternatives exist where required by law or agreement and where space permits.
- 6.A.2.1.I Added reference to applicable tariff or agreement.
- 6.B.2 Deleted reference to reinforced fiberglass mesh as a suitable cage material.
- 6.B.4 Clarified wording to indicate that cage must have a roof to insure security.
- 6.D.1 Clarified wording of card key access.
- 6.D.8 Added section on secure path access.

**Application**

- All Renumber pages to differentiate between Application, Quotation and Confirmation Notice, and Job Completion Notice. The last two items are to be completed by SWBT and returned to the collocator.
- All Anywhere there was an address field, an additional line was added for more room and for the collocator to add an email address if available.
- 2 The word Job replaced with Case for consistency.
- 3.1 The word equipment replaced with POT for clarity.



- 3.2 VG POT Frame added.  
5 Reformatted and reworded for clarity. DS3 option for 32 ckts added. This option may not be immediately available from the vendor, LUCENT technologies.
- 7.6 Clarified to indicate that the required input is the number of cables to be placed.
- 1 - Quotation Retitled and renumbered to indicate that this form is not required of the collocator but will be returned to the collocator by SWBT. Included so that collocator understands the type of information to be returned.
- 1 - Job Completion Retitled and renumbered to indicate that this form is not required of the collocator but will be returned to the collocator SWBT. Included so that collocator understands the type of information to be returned.
- 1 - Job Completion NSS reference changed to Project Manager.
- 2 - Job Completion Revised for clarity. Circuit Type field added to indicated if interconnection is VG, DS1, DS3, Fiber etc.

**Appendix**

- 1 - 6 Added the word "Tariff" for clarify.
- Page 15 Added Physical Collocation Grounding Diagram and Key.
- Pages 16 - 19 Replaced POT Frame Component list with most recent version.
- Pages 21 - 22 Added sources for technical references cited in this Technical Publication to make it easier for interconnectors to obtain.



# *Section 1*

## *General*

## 1. GENERAL

This Technical Publication provides the interconnector with information needed to apply for and operate in a physical collocation arrangement in a Southwestern Bell telephone Company central office building. To qualify as physical collocation, the requested arrangement must meet the following conditions:

The interconnector will install their own outside cables to be brought into the collocation space in the SWBT office. This requirement is not applicable to Local Service Providers (LSPs) who apply for collocation for the purpose of obtaining access to leased local loops. 48V. DC requirements can be served by some combination of the two arrangements offered. Equipment to be installed will be basic transmission equipment only. No administrative space will be allowed in the collocation area.

1.1 Under physical collocation, the interconnector pays for SWBT central office space in which to locate its own equipment necessary to terminate its transmission links. The interconnector has physical access to the SWBT central office to install, maintain and repair its equipment. Collocation agreements can be established on a month-to-month basis or for a specific negotiated term.

1.2 The interconnection point(s) will be located as close as reasonably possible to the central office and will be designated by SWBT. These points will be accessible by both SWBT and the interconnector on non-discriminatory terms. The interconnector will retain ownership of the cable, but will pay space rental for use of SWBT conduit and other facilities starting at or very near the interconnection point. SWBT will designate the point(s) of termination as the point(s) of physical demarcation between the interconnector's maintenance and ownership responsibilities and SWBT's maintenance and ownership responsibilities.

1.3 Microwave interconnection will require resolution of additional issues involving rooftop space availability and suitability for microwave antennas, as well as authorizations required under any other Regulations, Rules and Laws. However, the interconnection architectural and related standards will generally apply to microwave interconnection. SWBT will address any bona fide requests for microwave interconnection received on an individual case basis.

1.5 The interconnector shall, at its sole cost and expense procure, maintain, pay for and keep in force the following insurance coverage and any additional insurance and/or bonds required by law and underwritten by insurance companies having a BEST Insurance rating of A+VII or better, and which is authorized to do business in the jurisdiction in which the central office is located.

- (1) Commercial General Liability insurance with minimum limits of: \$1,000,000 General Aggregate limit: \$1,000,000 each occurrence sublimit for all bodily injury, property damage or medical expenses incurred in any one occurrence: \$1,000,000 each occurrence sublimit for Personal Injury and Advertising: \$1,000,000 Products/Completed Operations Aggregate limit, with a \$1,000,000 each occurrence sublimit for Products/Completed Operations. Said coverage shall include the contractual, independent contractors products/completed operations, broad form property, personal injury and fire legal liability.
- (2) If use of an automobile is required or if the interconnector is provided or otherwise allowed parking space by SWBT in connection with this Agreement, automobile liability insurance with minimum limits of \$1 million each accident for Bodily Injury, Death and Property Damage combine. Coverage shall extend to all owned, hired and non-owned automobiles.
- (3) Workers' Compensation insurance with benefits afforded in accordance with the laws of the State in which the space is to be provided.
- (4) Employer's Liability insurance with minimum limits of \$100,000 for bodily injury by accident, \$100,000 for bodily injury by disease per employee and \$500,000 for bodily injury by disease policy aggregate.
- (5) Umbrella/Excess liability coverage in an amount of \$5 million excess of coverage specified above.
- (6) All Risk Property coverage on a full replacement cost basis insuring all of the interconnector's personal property situated on or within the central office.
- (7) Interconnector shall also require subcontractors who may enter the central office to maintain the same insurance requirements listed above.
- (8) Interconnector shall furnish SWBT a certificate of insurance stating the types of insurance and policy limits.
- (9) Self insurance of the requirements listed above is permitted if:
  - a) The interconnector's tangible net worth is \$50 million or greater  
and
  - b) The interconnector files a financial statement annually with the SEC and/or has a financial strength rating of 4A or 5A assigned by Dun & Bradstreet.

## *Section 2*

### *Floor Space Planning*

## 2. FLOOR SPACE PLANNING

2.1 Physical collocation is available on a non-discriminatory first-come, first-served basis subject to the availability of space and facilities in each SWBT central office and in Controlled Environment Vaults (CEVS), Huts, and Cabinets where required by law. Virtual collocation is available on the same basis at any SWBT central office where there is not enough available space for physical collocation or physical collocation is not technically feasible, but where there is space available for virtual collocation.

2.2 In determining the availability of space for collocation, SWBT will take into account its own future needs for space. SWBT will not construct new buildings and/or additions or forgo its own planned use of central office space in order to accommodate interconnectors.

2.3 Partitioned space will be offered in 100 square foot. The interconnector must place transmission equipment in the partitioned space within the number of days specified by applicable tariffs or agreements after it is ready for occupancy or the space will be considered available for use by SWBT or other interconnectors.

2.4 Once SWBT has provided physical collocation in a particular central office, this offering may not be withdrawn for existing interconnectors due to space limitations. However, reasonable restrictions on the warehousing of unused space by an interconnector can be imposed by SWBT.

## *Section 3*

### *Engineering*

*A. Equipment Design*

*B. Power and Grounding*



# *Section 3A*

## *Equipment Design*